

1 CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW

2 Peter A. Schey (Cal. Bar No. 58232)

3 Carlos Holguín (Cal. Bar No. 90754)

4 256 South Occidental Boulevard

5 Los Angeles, CA 90057

6 Telephone: (213) 388-8693

7 Facsimile: (213) 386-9484

8 Email: pschey@centerforhumanrights.org

9 crholguin@centerforhumanrights.org

10 ORRICK, HERRINGTON & SUTCLIFFE LLP

11 Elena Garcia (Cal. Bar No. 299680)

12 egarcia@orrick.com

13 777 South Figueroa Street, Suite 3200

14 Los Angeles, CA 90017

15 Telephone: (213) 629-2020

16 *Attorneys for plaintiffs (listing continues on following page)*

17 UNITED STATES DISTRICT COURT

18 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

19 JENNY LISETTE FLORES, *et al.*,

20) Case No. CV 85-4544 DMG (AGR_{SEP})_{SEP}

21)

22 Plaintiffs,

23) **RESPONSE TO NOTICE OF THE**

24) **COURT RE: PROPOSED**

25) **MODIFICATION TO ORDER**

26) **APPOINTING SPECIAL**

27) **MASTER/INDEPENDENT**

28) **MONITOR**

29 - vs -

30 WILLIAM P. BARR, ATTORNEY GENERAL

31)

32 OF THE UNITED STATES, *et al.*,

33)

34 Defendants.

35)

36) [HON. DOLLY M. GEE]

1
2 *Plaintiffs' counsel, continued:*

3 LA RAZA CENTRO LEGAL, INC.
4 Michael S. Sorgen (Cal. Bar No. 43107)
5 474 Valencia Street, #295
6 San Francisco, CA 94103
Telephone: (415) 575-3500

7 THE LAW FOUNDATION OF SILICON VALLEY
8 LEGAL ADVOCATES FOR CHILDREN AND YOUTH
9 PUBLIC INTEREST LAW FIRM
10 Jennifer Kelleher Cloyd (Cal. Bar No. 197348)
11 Katherine H. Manning (Cal. Bar No. 229233)
12 Annette Kirkham (Cal. Bar No. 217958)
13 152 North Third Street, 3rd floor
14 San Jose, CA 95112
15 Telephone: (408) 280-2437
16 Facsimile: (408) 288-8850
17 Email: jenniferk@lawfoundation.org
kate.manning@lawfoundation.org
annettek@lawfoundation.org

18 *Of counsel:*

19 YOUTH LAW CENTER
20 Virginia Corrigan (Cal. Bar No. 292035)
21 832 Folsom Street, Suite 700^{LLP}
22 San Francisco, CA 94104
23 Telephone: (415) 543-3379

24 ///

25

26

27

28

1 Plaintiffs hereby give notice that they have no objection to the modifications to
2 the Order Appointing Special Master/Independent Monitor [Dkt. # 494] proposed by
3 the Special Master/Independent Monitor in the Notice to the Court Re: Proposed
4 Modification to Order Appointing Special Master/Independent Monitor [Dkt. # 529].
5
6
7

8 Dated: March 21, 2019

Respectfully submitted,

9 CENTER FOR HUMAN RIGHTS &

10 CONSTITUTIONAL LAW

11 Peter A. Schey

Carlos Holguín

12 ORRICK, HERRINGTON & SUTCLIFFE LLP

13 Elena García

14 LA RAZA CENTRO LEGAL, INC.

15 Michael Sorgen

16 LAW FOUNDATION OF SILICON VALLEY -

17 LEGAL ADVOCATES FOR CHILDREN & YOUTH

18 Jennifer Kelleher Cloyd

19 Katherine H. Manning

Annette Kirkham

20 Of counsel:

21 YOUTH LAW CENTER

22 Virginia Corrigan

24 /s/Peter Schey

25 Attorneys for Plaintiffs

1 CERTIFICATE OF SERVICE
2
3

4 I, Peter Schey, declare and say as follows:
5
6

7 I am over the age of eighteen years of age and am a party to this action. I am
8 employed in the County of Los Angeles, State of California. My business address is
9 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state. [REDACTED]
10 [SEP]

11 On March 21, 2019 I electronically filed the following document(s):
12

13 • **RESPONSE TO NOTICE OF THE COURT RE: PROPOSED
14 MODIFICATION TO ORDER APPOINTING SPECIAL
15 MASTER/INDEPENDENT MONITOR**

16 with the United States District Court, Central District of California by using the
17 CM/ECF system. Participants in the case who are registered CM/ECF users will be
18 served by the CM/ECF system.
19
20

21 /s/Peter Schey
22
23
24
25
26
27
28

29 *Attorney for Plaintiffs*